

Exhibit A

From: Miglio, Terrence J. [mailto:tmiglio@varnumlaw.com]
Sent: Tuesday, September 30, 2014 11:01 AM
To: Keith Flynn
Cc: Buchanan, Barbara E.; Ada Verloren
Subject: RE: Henry Ford Discovery Responses

Mr. Flynn, we have been in a jury trial in Columbus Ohio since 9/22. The trial has just wrapped up. We will review our responses and supplement.

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From: Keith Flynn [mailto:KFlynn@millercohen.com]
Sent: Tuesday, September 30, 2014 10:59 AM
To: Miglio, Terrence J.
Cc: Buchanan, Barbara E.; Ada Verloren
Subject: Henry Ford Discovery Responses

Counsel:

I have reviewed your responses to our discovery requests and they are wholly unacceptable and non-responsive. On my initial review, it does not appear that you fully answered a single interrogatory nor did you provide a single document—not even Ms. Reeser's personnel file. Instead, you rely on general objections. Defendant is obligated to produce information and documents that are reasonably calculated to lead to the discovery of relevant information. FED. R. CIV. PRO. 26(b)(1). Defendant cannot refuse to answer and choose to "simply intone [the] familiar litany that the interrogatories are burdensome, oppressive or overly broad." *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 17, 42 (S.D.N.Y. 1984); *Hickman v. Taylor*, 329 U.S. 495, 507 (1947). This is inappropriate and delays Plaintiff's discovery efforts.

Unless you plan to supplement by the end of the work week, Plaintiff will file a motion to compel. If you refuse to concur, Plaintiff will seek all reasonable expenses incurred in making the motion, including attorney's fees pursuant to FED. R. CIV. PRO. 37(a)(5).

This constitutes Plaintiff's request for concurrence.

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